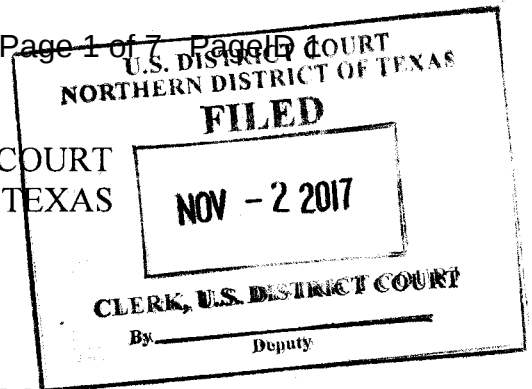


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:17-MJ-846

YUSEF HENDI (01)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Between on or about September 3, 2016 and September 13, 2016, **Yusef Hendi**, the defendant, knowingly received by any means, any visual depiction using any means and facility of interstate and foreign commerce, knowing the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

Specifically, using the Kik application and the Internet, **Hendi** received the following visual depiction of a minor engaged in sexually explicit conduct:

File Name	File Description
[redacted]871d	This file is a fifteen second video of a twelve-year-old minor female who is nude from the waist down. During the video, the child inserts a toothbrush into her vagina while standing on a bathroom counter.

In violation of 18 U.S.C. § 2252(a)(2).

I further state I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), and that this complaint is based on the following facts gathered through an investigation I have conducted, my

training and experience, and information provided to me by law enforcement officials in Canada.

INTRODUCTION

1. I have been employed as a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), since December 2008. I am a graduate of the Criminal Investigator Training Program and the U.S. Immigration and Customs Enforcement Special Agent Training Academy. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21 and 31 of the United States Code. I am an “investigative or law enforcement officer of the United States” within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

2. I am currently assigned to the HSI Dallas, Texas Field Office, Child Exploitation Group, where I investigate criminal violations relating to the sexual exploitation of children, including illegal coercion and enticement, and the production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2422, 2251, 2252 and 2252A. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. § 2252(a)(2) for an individual to use any means and facility of interstate commerce to receive a depiction of a minor engaged in sexually explicit activity.

OVERVIEW OF INVESTIGATION

3. In October 2016, the Windsor Police Service (WPS) in Ontario, Canada, was contacted by the mother of a 12 year-old female, hereinafter referred to as Minor Victim 1 (MV1). The mother advised WPS investigators that in September 2016, MV1 had been forced to send sexually explicit images and videos to an unknown individual on Kik¹. MV1's mother informed investigators that she observed a conversation between MV1 and this individual, during which the unknown subject threatened to post MV1's sexually explicit images on social media if MV1 did not send additional images. MV1's mother specifically identified the video referenced on page one of this affidavit, and advised that it was produced at a hotel room in Mexico during a family trip between September 3, 2016 and September 13, 2016.

4. In November 2016, a WPS computer forensics examiner conducted a consensual search of MV1's iPod, and located a Kik conversation with an individual using Kik username "[redacted].e", display name "GIRLS ONLY". During this chat conversation, the Kik user demanded to receive access to MV1's email account, and threatened to expose "everything" online if she did not comply. The subject also sent MV1 a screenshot of several sexually explicit files of MV1, which appeared to be saved to a mobile device, and included a message that stated "I'm about to make video and upload it online and post the pic too". The WPS examiner determined several of the files

¹ Kik is an instant messaging smartphone application that allows users to communicate without sharing a telephone number. Kik users can use the application to transmit messages, images, videos and other content.

sent by MV1 to this unknown subject satisfied the Canadian Criminal Code's definition of child pornography.

5. In November 2016, WPS submitted a Canadian Production Order to Kik, requesting the subscriber information and contents associated with Kik account "[redacted].e." In March 2017, WPS received the information from Kik relating to the Kik account under investigation. WPS Constable Liyu Guan reviewed the Kik records, which included the following subscriber information:

Name: GIRLS ONLY
Email: hindi[redacted]@[redacted].com
Registration Device: Samsung SM-N900T

6. Constable Guan reviewed the contents of the Kik account, and observed sexually explicit images and videos of several minor females between the approximate ages of 12 to 16 years old. Many of these files consisted of screenshots that depicted the victims, as well as text communications that indicate the minors were coerced into producing the illicit content by sextortion². Constable Guan also observed log-in records that indicated the profile was being accessed using an Internet Protocol (IP) address that resolved to the Fort Worth, Texas area. Because the user of this suspect account appeared to be located in the United States, WPS contacted the HSI attaché office in Toronto, Canada for assistance with the investigation; and HSI Toronto subsequently forwarded this information to the HSI Dallas Child Exploitation Group.

² The term "sextortion" refers to a form of sexual exploitation and extortion that employs non-physical forms of coercion, such as blackmail, to acquire sexual content (e.g., sexually explicit photographs and videos), money or sexual favors from the victim.

7. Beginning on or about September 5, 2017, I began reviewing the evidence relating to this case. During a review of the contents of the Kik account under investigation, I observed evidence that indicates the user of this account was utilizing the account to sexually exploit several minors. Screenshots found within the contents of this account indicated the user of the account coerced multiple female minors to produce sexually explicit images and videos, by threatening to post their pictures online, or by threatening to commit suicide if the minor did not comply.

8. On or about September 14, 2017, HSI served a subpoena on Kik for subscriber information and recent log-in data relating to Kik account "[redacted].e." On or about September 15, 2017, Kik responded with the following subscriber information:

Name: GIRLS ONLY
Email: hindi[redacted]@[redacted].com
Registration Device: Verizon SM-G920V
IP Addresses: 76.186.70.35; 24.182.202.179;

9. On September 20, 2017, HSI served a subpoena on Charter Communications for the subscriber information relating to the customers assigned IP address 76.186.70.35 at the time it was used to access the Kik account under investigation. On or about October 5, 2017, Charter reported this IP address 76.186.70.35 was assigned to the following subscriber:

Subscriber Name: K. Hindi
Subscriber Address: [address redacted], Arlington, TX
Lease Dates: June 6, 2017 to September 22, 2017
Activation Dates: September 26, 2014 to present

10. Based in part on this information, on November 1, 2017, HSI executed a federal search warrant at [address redacted], Arlington, Texas. After knocking and

announcing their presence at the front door, agents were greeted by **Yousef Hendi**. While other agents conducted the search of the residence, I conducted a post-*Miranda* interview with **Hendi**. During this interview, **Hendi** claimed ownership of the Kik account under investigation, as well as the email address associated with this account. **Hendi** advised that he had communicated with various minors on Kik, and admitted to coercing some of these minors to produce sexually explicit images and videos. **Hendi** reported that he used his cellular phone and the Internet services at his residence and job to facilitate these offenses.


11. During the interview, I showed **Hendi** an image of MV1 that was located within the contents of his Kik account. After viewing the photograph, **Hendi** advised that he recalled communicating with MV1, and believed she looked about 14 or 15 years old. **Hendi** was shown images of other minors found in his Kik account, and estimated these individuals to be teenagers as young as 12 years old.

12. Based on my training and experience in child exploitation investigations, I am aware that smartphone applications like Kik require use of the Internet to transmit and receive content. I am also aware that the Internet is a means and facility of interstate and/or foreign commerce.

CONCLUSION

13. Based on the facts set forth in this affidavit, I respectfully submit there is probable to believe that between on or about September 3, 2016 and September 13, 2016,

Yousef Hendi knowingly used any means and facility of interstate commerce to receive a depiction of a minor engaged in sexually explicit activity, in violation of 18 U.S.C. § 2252(a)(2).



LeAndrew J. Mitchell, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 2nd day of November 2017, at 2:03 a.m./~~p.m.~~ in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE